

## Exhibit 12

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

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IN RE: NATIONAL PRESCRIPTION MDL No. 2804  
OPIATE LITIGATION

Case No.

17-md-2804

Judge Dan Aaron  
Polster

This document relates to:  
The County of Summit, Ohio, et al. v. Purdue  
Pharma L.P., et al., Case No. 18-OP-45090

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Videotaped Deposition of  
GRETA JOHNSON, 30(b)(6)

January 15, 2019

8:30 a.m.

Taken at:

Sheraton Suites Akron  
1989 Front Street - Portage Room  
Cuyahoga Falls, Ohio

Stephen J. DeBacco, RPR

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1 epidemic?

2 A. It has become sort of this  
3 stepsister to the epidemic because of the  
4 shifts in the way people are using opioids.  
5 Cocaine has been used more recently in  
6 conjunction with opioids.

7 Q. Is -- in your understanding, is the  
8 opioid epidemic what this lawsuit is about?

9 A. This lawsuit is -- is about the  
10 aggregate harm that's been caused by the  
11 manufacture and distribution of opioids into  
12 our community.

13 Q. When did the opioid epidemic begin?

14 A. Opioids have always been in our  
15 community, but I believe we really saw an  
16 uptick in the presence of diverted pills and  
17 use really started to come along in the late  
18 2000s.

19 And certainly we noticed that in  
20 the prosecutor's office where folks were being  
21 arrested and having one or two pills in their  
22 pocket, folks were being arrested for deception  
23 to obtain a dangerous drug or forging drug  
24 documents. We started to see that uptick in  
25 the late -- in the late 2000s.



1 was a problem?

2 A. Personally? I first became aware  
3 that there was a real difference in some of the  
4 cases I was seeing. I was seeing, instead of  
5 detectives who were bringing in crack cases or  
6 things like that, we started to see a lot of  
7 pill cases; a lot of defendants without a prior  
8 record, being arrested for possession of  
9 oxycodone, OxyContin, Percocets. And we  
10 started to see, in the late 2000s, this  
11 increase in cases of deception to obtain and  
12 forging drug documents.

13 These folks had become so addicted  
14 that they were resorting to, you know, trying  
15 to write false prescriptions, trying to obtain  
16 these pills in a different manner.

17 Q. And when was it that you started  
18 seeing this?

19 A. In the late 2000s is really --

20 Q. 2007? 2008? Somewhere in there?

21 A. I -- I remember it steadily  
22 growing. I can recall being -- in 2009, I was  
23 the grand jury prosecutor, and I recall seeing  
24 many of those cases in sort of a way that I had  
25 not previously.

1           Q.     Do you think, at the time that you  
2 personally perceived that there was a problem,  
3 do you think that generally there was an  
4 understanding in Summit County at that time  
5 that there was a problem?

6           A.     Calling it a problem, I think at  
7 that time, as a prosecutor, I was aware that  
8 this was a change that we were perceiving. I  
9 think at that time the ADM Board and Summit  
10 County Public Health started to perceive that  
11 the people seeking treatment were coming in for  
12 opioid addiction in greater numbers than they  
13 had previously seen. I think our hospitals saw  
14 that there were more babies being born with NAS  
15 than they had previously seen.

16                     And at that point, I think, you  
17 know, there were some -- some concerns, but not  
18 a true identification of the root cause yet.

19           MS. WINNER: I'd like to ask the  
20 reporter to mark as Exhibit 2 a document  
21 entitled "Drug Threat Assessment, Summit  
22 County, Ohio." It appears to be a 2005  
23 document.

24                     - - - - -

25                     (Thereupon, Deposition Exhibit 2,

1 threat" says, "The diversion of narcotics and  
2 pain analgesics in Summit County continues to  
3 increase."

4 A. Uh-huh.

5 Q. Do you see that?

6 A. Yes, I do.

7 Q. And was that a correct statement in  
8 2005?

9 A. I'm sure that it was.

10 Q. And then it then goes on to refer  
11 to some of the -- the drugs --

12 A. Yes.

13 Q. -- correct?

14 And then under "Availability," he  
15 goes on to say, quote, "While there are no  
16 conclusive estimates as to the total amount of  
17 diverted prescription narcotics, depressants,  
18 and stimulants available in the drug markets of  
19 Summit County, it is known that legitimate  
20 commercial disbursement of prescription  
21 pharmaceuticals distributed to pharmacies,  
22 hospitals, and practitioners has increased  
23 sharply over the past four years, thereby  
24 making more of the drugs available to criminal  
25 diversion and abuse."

1                   Is that a correct statement, as far  
2                   as you were aware?

3                   A.       I just want to read it again.   It's  
4                   a long sentence.

5                   Q.       Sure.

6                   A.       Yes, I would agree with that.

7                   Q.       So again, this is -- this is  
8                   information that was known to Summit County in  
9                   2005, correct?

10                  A.       Yes.   We were starting to become  
11                  very aware that pills were beginning to flood  
12                  our community.

13                  Q.       And the next sentence goes on to  
14                  say, quote, "In a sampling of data from the  
15                  Akron Police Department's narcotics unit  
16                  diversion division during the first quarter of  
17                  2004, the unit investigated 60 new diversion  
18                  cases, or one case every day and a half," end  
19                  quote.

20                         Is that an accurate statement, as  
21                         far as you were aware?

22                  A.       I assume that the Akron Police  
23                  narcotics unit can provide the data that would  
24                  back that up.   I can't imagine there would be  
25                  any reason that Captain Baker would have